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Attorneys for FREEDOM MORTGAGE CORPORATION

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

GUSTAVO EQIZI, JR. A/K/A GUSTAVO : CASE NO. 19-28989-JNP
EGIZI JR

JUDITH EGIZI AKA JUDY EGIZI
Debtors

: **NOTICE OF MOTION FOR
: RELIEF FROM AUTOMATIC
: STAY PURSUANT TO 11 USC
: SECTION 362(d) AND RELIEF
: FROM CO-DEBTOR STAY
: PURSUANT TO 11 USC
: SECTION 1301(c)**

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NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY (REAL PROPERTY)

FREEDOM MORTGAGE CORPORATION (hereinafter 'Movant') has filed papers with the Court to have an Order entered granting it relief from the automatic stay and co-debtor stay against the property commonly known as 201 PRAIRIE COURT- UNIT 201, QUAKERTOWN, PA 18951.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the Court to grant Movant relief from the automatic stay and co-debtor stay regarding the above real property, or if you want the Court to consider your views on the Motion, then on or before 05/12/2020 you or your attorney must:

File with the Court a written response to Movant's Motion explaining your position. Your response must be filed with the Bankruptcy Clerk of the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608.

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

/s/ Melanie Grimes
Melanie Grimes, Esq.
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1617 JFK Boulevard, Suite 1400
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Tel: 856-813-5500 Ext. 46245
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U.S. Trustee
Isabel C. Balboa, Trustee
Cherry Tree Corporate Center, 535 Route 38 -
Suite 580
Cherry Hill, NJ 08002
Chapter 13 Trustee

If you are opposing the Order Movant is seeking from the Court, you must attend the hearing scheduled to be held on 05/19/2020 at 10:00 a.m. at the United States Bankruptcy Courthouse, 400 COOPER STREET, FOURTH FLOOR, CAMDEN, NJ, before the Honorable JERROLD N. POSLUSNY JR., presiding.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: March 12, 2020

/s/ Melanie Grimes
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